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JUN 2 3 2015

Clerk, U.S. District Court District Of Montana Helena

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MONTANA

BILLINGS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

LA MONETA CAMBIO SA, GERMAN COPPOLA, PABLO COPPOLA, and FRANCISCO PAGANO,

Defendants.

FILED UNDER SEAL PURSUANT TO L.R. 49.1(2)

CR 14-117-BLG-SPW

MOTION TO QUASH ARREST WARRANT AND ISSUE SUMMONS FOR DEFENDANT GERMAN COPPOLA

The United States of America, by and through Assistant United States

Attorneys Zeno B. Baucus and Chad C. Spraker, moves the Court to quash the arrest warrant and issue a criminal summons for an August or September 2015 appearance date as it relates to Defendant German Coppola.

On November 20, 2014, a Montana Grand Jury returned a criminal Indictment charging German Coppola and other named defendants with money laundering-related charges. A warrant was issued for the arrest of German Coppola as a result. On December 10, 2014, the Court granted the United States' motion to unseal the Indictment for the limited purpose of providing it to defense counsel. Doc. 12. A copy of the sealed Indictment was subsequently provided to German Coppola's counsel.

The parties have continued to negotiate a potential resolution of this case and, during those discussions, German Coppola's counsel has inquired if he could be permitted to travel to the United States on his own volition and voluntarily appear pursuant to a summons. The undersigned has obtained written confirmation from Mr. Coppola's counsel that he would accept a criminal summons on his behalf and that Mr. Coppola would, if a criminal summons was issued, voluntarily travel to the United States for purposes of an appearance in August or September 2015. As such, the United States now respectfully moves to quash the arrest warrant as to German Coppola and issue a criminal summons

reflecting an appearance date in August or September 2015. The United States reminds the Court that Defendant La Moneta, who the United States is currently attempting to serve through a Mutual Legal Assistance Treaty (MLAT) with Argentina, is currently scheduled to appear pursuant to a summons on September 22, 2015, Doc. 18, and it would be the preference of the United States that Mr. Coppola's appearance date be in close temporal proximity to La Moneta's. Mr. German Coppola's counsel has stated he is unavailable the following dates: August 3, September 14-15, and September 22-24, 2015.

Should the Court grant this motion the United States will remove any red notices relating to Mr. Coppola's travel so that he can travel to the United States for an appearance date. Thus, the United States respectfully requests that the Court quash the arrest warrant and issue a summons for an appearance date in August or September 2015.

DATED this 23rd day of June, 2015.

MICHAEL W. COVTER United States Attorney

Assistant U.S. Attorney
Attorney for United States

CERTIFICATE OF COMPLIANCE

Pursuant to D. Mont. LR 7.1(d)(2) and CR 12.1(e), the attached Motion to Quash Arrest Warrant and Issue Summons is proportionately spaced, has a typeface of 14 points or more, and the body contains 388 words.

ZENO B. BAUCUS

Assistant U.S. Attorney

Attorney for United States